

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Dale Jerome Delliss, Debtor

**Case No. 20-50340-KMS
CHAPTER 13**

NOTICE

Debtor has filed papers with the court to Modify their Chapter 13 Bankruptcy Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amend the Plan, or if you want the court to consider your views on the Motion, then on or before March 20, 2023 (30 days), you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
P.O. Box 2448
Jackson, MS 39225-2448

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Modify Plan.

Date: February 17, 2023

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Dale Jerome Delliss, Debtor

**Case No. 20-50340-KMS
CHAPTER 13**

MOTION TO MODIFY BANKRUPTCY PLAN

COMES NOW, Debtor, by and through counsel, and moves this Court to modify their Chapter 13 plan, and in support thereof, would show the Court as follows:

1. Debtor commenced this case on 02/21/2020 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. That the trustee received insurance proceeds from the wreck of a vehicle and these funds were applied to the case. As such, the plan can be completed within approximately 4 months. That Debtor is eligible for a 3 year plan.
3. Debtor wishes for the following changes to be made to their bankruptcy:
 - a. That the plan be reduced to a 39 months plan and the wage Order adjusted to \$201.00 effective in February 2023.
4. Debtor wishes for the Trustee to cure any deficiency including ongoing mortgage payments paid through the plan, if one exists, and adjust the wage order as needed.

WHEREFORE, Debtor prays that their Bankruptcy Plan be modified to reflect the above-mentioned changes and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.
Jennifer Ann Curry Calvillo
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Modify Plan was forwarded on February 17, 2023, to:

By Electronic CM/ECF Notice:

Warren Cuntz

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI
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10 IN RE:
11 DALE JEROME DELLISS
12
1314 CASE NO: 20-50340
15 **DECLARATION OF MAILING**
16 **CERTIFICATE OF SERVICE**
17 Chapter: 13
1819 On 2/17/2023, I did cause a copy of the following documents, described below,
20 30 Day Notice and Motion
21
2223 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
24 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
25 incorporated as if fully set forth herein.
2627 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
28 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
29 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
30 fully set forth herein.
3132 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
33 served electronically with the documents described herein per the ECF/PACER system.
3435 DATED: 2/17/2023
3637 /s/ Thomas C. Rollins, Jr
38 Thomas C. Rollins, Jr 103469
39
4041 The Rollins Law Firm, PLLC
42 PO Box 13767
43 Jackson, MS 39236
44 601 500 5533
45 trollins@therollinsfirm.com
46
47

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

CASE NO: 20-50340

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 2/17/2023, a copy of the following documents, described below, were served on the parties listed below:

30 Day Notice and Motion

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 2/17/2023


Jay S. Jump
BK Attorney Services, LLC
d/b/a certificateofservice.com, f
Thomas C. Rollins, Jr
The Rollins Law Firm, PLLC
PO Box 13767
Jackson, MS 39236

USPS FIRST CLASS MAILING RECIPIENTS:

Parties whose names are struck through were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 20-50340
 SOUTHERN DISTRICT OF MISSISSIPPI
 FRI FEB 17 10-0-16 PST 2023

ALLY CAPITAL CO AIS PORTFOLIO SERVICES
 LP
 4515 N SANTA FE AVE DEPT APS
 OKLAHOMA CITY OK 73118-7901

LVNV FUNDING LLC
 PO BOX 10587
 GREENVILLE SC 29603-0587

EXCLUDE

US BANKRUPTCY COURT
 DAN M RUSSELL JR US COURTHOUSE
 2012 15TH STREET SUITE 244
 GULFPORT MS 39501-2036

ATT MOBILITY
 PO BOX 536216
 ATLANTA GA 30353-6216

ALLY CAPITAL
 PO BOX 130424
 ROSEVILLE MN 55113-0004

ALLY FINANCIAL
 PO BOX 380901
 BLOOMINGTON MN 55438-0901

BARCLAYS CARD
 PO BOX 60517
 CITY OF INDUS CA 91716-0517

BIG LOTS
 PO BOX 30253
 SALT LAKE CIT UT 84130-0253

BRENDA CHAPELLE
 1101 BEACH ST
 SUITE 111
 FLINT MI 48502-1417

CAPITAL ONE
 PO BOX 30281
 SALT LAKE CITY UT 84130-0281

CAPITAL ONE NA
 BY AMERICAN INFOSOURCE AS AGENT
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

CITIBANK
 PO BOX 6497
 SIOUX FALLS SD 57117-6497

CITIBANK NA
 5800 S CORPORATE PL
 SIOUX FALLS SD 57108-5027

COMENITY
 PO BOX 182273
 COLUMBUS OH 43218-2273

CREDIT CENTRAL LLC
 1123 1ST ST N
 STE A
 ALABASTER AL 35007-8727

CREDIT ONE
 PO BOX 98872
 LAS VEGAS NV 89193-8872

DEPARTMENT OF THE TREASURY
 INTERNAL REVENUE SERVICE
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

DR MICHAEL PAYMENT
 4533 13TH ST
 GULFPORT MS 39501-2516

FORTIVA
 POB 105555
 ATLANTA GA 30348-5555

HMC GROUP
 29065 CLEMENTS RD
 WESTLAKE OH 44145-1179

INTERNAL REVENUE SERVI
 CO US ATTORNEY
 501 EAST COURT ST
 STE 4430
 JACKSON MS 39201-5025

(P) JEFFERSON CAPITAL SYSTEMS LLC
 PO BOX 7999
 SAINT CLOUD MN 56302-7999

EXCLUDE
 (D) (P) JEFFERSON CAPITAL SYSTEMS LLC
 PO BOX 7999
 SAINT CLOUD MN 56302-7999

KEESLER FEDERAL CREDIT UNION
 ATTEN BANKRUPTCY
 PO BOX 7001
 BILOXI MS 39534-7001

LVNV FUNDING LLC
 PO BOX 60500
 CITY OF INDUS CA 91716-0500

EXCLUDE
 (D) LVNV FUNDING LLC
 PO BOX 10587
 GREENVILLE SC 29603-0587

USPS FIRST CLASS MAILING RECIPIENTS:

Parties whose names are struck through were not served via First Class USPS Mail Service.

LVNV FUNDING LLC
 RESURGENT CAPITAL SERVICES
 PO BOX 10587
 GREENVILLE SC 29603-0587

LABORATORY CORP OF AME
 PO BOX 2240
 BURLINGTON NC 27216-2240

MERRICK BANK
 RESURGENT CAPITAL SERVICES
 PO BOX 10368
 GREENVILLE SC 29603-0368

MHG ANESTHESIA GROUP
 PO BOX 2080
 KILMARNOCK VA 22482-2080

MARINER FINANCE LLC
 8211 TOWN CENTER DRIVE
 NOTTINGHAM MD 21236-5904

MEMORIAL EMERGENCY PHY
 PO BOX 555
 BILOXI MS 39533-0555

MEMORIAL HOSPITAL
 PO BOX 1810
 GULFPORT MS 39502-1810

(P)MERCHANTS ADJUSTMENT SERVICE INC
 ATTN ATTN SHERI
 PO BOX 7511
 MOBILE AL 36670-0511

MERRICK BANK
 PO BOX 9201
 OLD BETHPAGE NY 11804-9001

QUANTUM3 GROUP LLC AS AGENT FOR
 COMENITY CAPITAL BANK
 PO BOX 788
 KIRKLAND WA 98083-0788

STATE OF MICHIGAN CHIL
 PO BOX 30478
 LANSING MI 48909-7978

SYNCHRONY BANK
 PO BOX 965005
 ORLANDO FL 32896-5005

SYNCHRONY BANK
 CO PRA RECEIVABLES MANAGEMENT LLC
 PO BOX 41021
 NORFOLK VA 23541-1021

THE BANK OF MISSOURI
 THE BANK OF MISSOURI DBA FORTIVA
 PO BOX 105555
 ATLANTA GA 30348-5555

THE HOME DEPOT
 PO BOX 6497
 SIOUX FALLS SD 57117-6497

TIME PAYMENT CORP
 16 NE EXECUTIVE PARK
 200
 BURLINGTON MA 01803

US ATTORNEY GENERAL
 US DEPT OF JUSTICE
 950 PENNSYLVANIA AVENW
 WASHINGTON DC 20530-0001

EXCLUDE
 UNITED STATES TRUSTEE
 501 EAST COURT STREET
 SUITE 6 430
 JACKSON MS 39201 5022

VERIZON
 BY AMERICAN INFOSOURCE AS AGENT
 4515 N SANTA FE AVE
 OKLAHOMA CITY OK 73118-7901

VERIZON WIRELESS
 PO BOX 650051
 DALLAS TX 75265-0051

DEBTOR
 DALE JEROME DELLISS
 200 LAWLER AVE APT 4
 LONG BEACH MS 39560-4827

THOMAS CARL ROLLINS JR
 THE ROLLINS LAW FIRM PLLC
 PO BOX 13767
 JACKSON MS 39236-3767

EXCLUDE
 WARREN A CUNTZ T1 JR
 P O BOX 3749
 GULFPORT MS 39505 3749